REMARKS

I. INTRODUCTION

In response to the Office Action dated March 12, 2008, which was made final, and in conjunction with a Request for Continued Examination (RCE) submitted herewith, claims 2, 8 and 14 have been canceled, and claims 1, 7 and 13 have been amended. Claims 1, 3-7, 9-13 and 15-18 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. PRIOR ART REJECTIONS

In paragraph (2) of the Office Action, claims 1-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bonney et al., U.S. Patent No. 6,466,953 (Bonney) in view of Shema et al., U.S. Publication No. 2002/0194190 (Shema).

Applicants' attorney respectfully traverses these rejections.

Independent claims 1, 7 and 13 have been amended to better distinguish over the references. Specifically, independent claims 1, 7 and 13 now recite an invention directed to a graphics program operated by a computer, wherein one or more functions of a Sheet Set Manager are performed in the graphics program. The Sheet Set Manager manages one or more Sheet Sets, each of the Sheet Sets comprises a collection of zero or more Sheets and Subsets of the Sheets, and each of the Sheets comprises a drawing, layout or view. The Sheet Set Manager also includes a window that presents a logical structure for Sheet Sets in a visual form comprising a hierarchical representation of the Sheet Set. In addition, the Sheet Set Manager allows users to place callouts on the Sheets directly from the window of the Sheet Set Manager showing the logical structure for the Sheet Sets in visual form, and the callouts indicate which other Sheets or Views to display for additional information. The combination of Bonney and Shema does not teach or suggest all of these limitations.

Nonetheless, the Office Action asserts the following:

> Claims 1-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bonney et al. ("Bonney", US 6,466,953 B1) in view of Shema et al. ("Shema", US 2002/0194190 A1).
> Claim 1 : Bonney teach, A method for operating a graphics program in a computer (Fig. 8), comprising:
> performing one or more functions of a Sheet Set Manager in the graphics program (while described in terms of "sheets," the present invention is not limited to use with CAD sheets, and can be used with other types of objects, col 3/4 lines 65-7 and Fig. 2),

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(a) wherein the Sheet Set Manager manages a one or more Sheet Sets (organizational and management of hierarchical relationships sheets, col 1 lines 10-14), each of the Sheet Sets comprises a collection of zero or more Sheets and Subsets of the Sheets, each of the Sheets comprises a drawing, layout or view (generates objects of the drawing sheets, col 3/4 lines 65-7 and Fig.2), but does not explicitly teach,

(b) and wherein the Sheet Set Manager allows users to place callouts on the Sheets directly from a window of the Sheet set Manager showing a logical structure for the Sheet Sets in visual form. .

However, Shema teach, a method, computer program product, and system for creating and viewing an intelligent graphics file including parts information, and further depicts an embodiment of the present invention displaying a graphic representation of an article on one of a plurality of sheets within a drawing set (paragraph [0054] and Fig. 7). Therefore, it would have been obvious to an artisan at the time of the invention to combine Shema's teaching with in Bonney, to find callout features directly from a visual file structure in the same window, in Bonney, in order to help the user to find the callout features easily, and to visualize the impact of placing the callouts of the document, more effectively.

Claim 2: Bonney teach, wherein the callouts indicate which Sheet or View to display for additional information (Fig. 4).

Claim 3: Bonney teach, wherein the Sheet Set Manager automatically creates fields that display appropriate labels when the callouts are placed on the Sheets (links descriptive fields in one or more icons, col 3 lines 2-15 Fig. 4).

Claim 4: Bonney teach, wherein the Sheet Set Manager allows users to place callouts on the Sheets before a referenced Sheet or View has been defined. Official Notice is taken that the use of placing callouts/icons is well known in the art, especially in linking/referencing an object. It would have been obvious to an artisan at the time of the invention to allow the user to place a callout/icon with or without a placeholder, as it is the most convenient and efficient way for the user to use a CAD tool (See Shema).

Claim 5: Bonney teach, wherein the Sheet Set Manager automatically updates the callouts (update icons automatically, col 3 lines 2-15 Fig. 4).

Claim 6: Bonney teach, wherein the Sheet Set Manager allows users to create collections of callouts. Official Notice is taken that the creation of a group or a collection of callouts/icons is well known in the art, especially in linking/referencing a set of objects. It would have been obvious to an artisan at the time of the invention to allow the user to create a group or collection of callouts/icons that can be repeated reused, as it is the most convenient and efficient way for the user to use a CAD tool (See Shema).

Claim 7 is similar in scope to claim 1, and therefore rejected under similar rationale. Bonney further teach, apparatus used in CAD environment (Fig. 1).

Claim 8 is similar in scope to claim 2, and therefore rejected under similar rationale.

Claim 9 is similar in scope to claim 3, and therefore rejected under similar rationale.

Claim 10 is similar in scope to claim 4, and therefore rejected under similar rationale.

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Claim 11 is similar in scope to claim 5, and therefore rejected under similar rationale.

Claim 12 is similar in scope to claim 6, and therefore rejected under similar rationale.

Claim 13 is similar in scope to claim 1, and therefore rejected under similar rationale. Bonney further teach, program instructions are to be provided from a storage device such as CD-ROM (col 3 line 52-62).

Claim 14 is similar in scope to claim 2, and therefore rejected under similar rationale.

Claim 15 is similar in scope to claim 3, and therefore rejected under similar rationale.
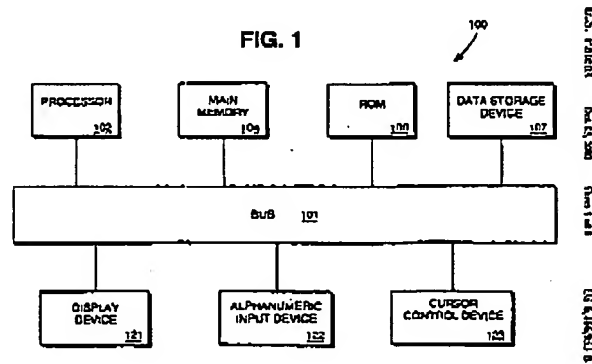
Claim 16 is similar in scope to claim 4, and therefore rejected under similar rationale.

Claim 17 is similar in scope to claim 5, and therefore rejected under similar rationale.
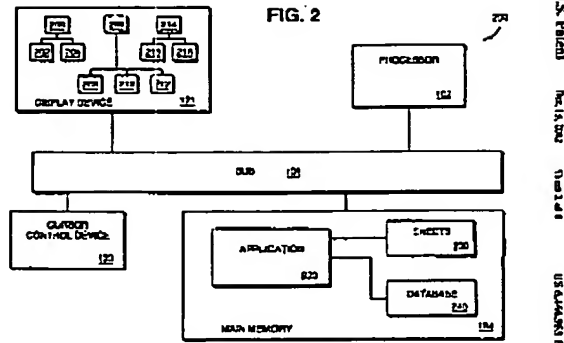
Claim 18 is similar in scope to claim 6, and therefore rejected under similar rationale.

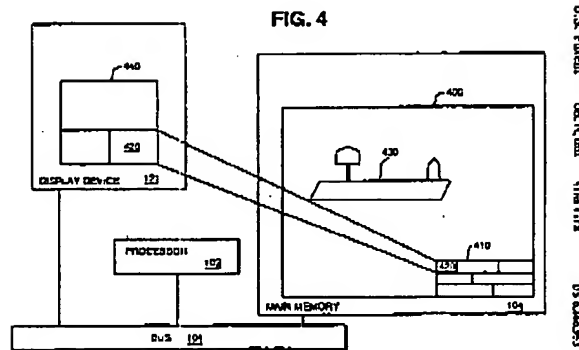The portions of Bonney and Shema cited by the Office Action are reproduced below:
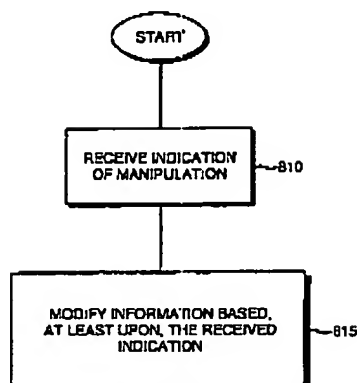
Bonney: Fig. 1

FIG. 1

| PROCESSOR 102 | MAIN MEMORY 104 | ROM 106 | DATA STORAGE DEVICE 107 |

BUS 101

| DISPLAY DEVICE 121 | ALPHANUMERIC INPUT DEVICE 122 | CURSOR CONTROL DEVICE 123 |

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Bonney: Fig. 2

FIG. 2

Bonney: Fig. 4

FIG. 4

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Bonney; Fig. 8

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FIG. 8

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           ( START )
               |
               |
     +---------------------+
     | RECEIVE INDICATION  |
     |   OF MANIPULATION   |——810
     +---------------------+
               |
               |
     +-----------------------+
     |  MODIFY INFORMATION   |
     |  BASED, AT LEAST      |——815
     |  UPON, THE RECEIVED   |
     |     INDICATION        |
     +-----------------------+
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Bonney: col. 1, lines 10-14

The present invention relates to management of computer aided design
(CAD) drawings. More particularly, the present invention relates to organization and
management of hierarchical relationships sheets included within the CAD drawings.

Bonney: col. 3, lines 2-15 (actually, col. 2/3, lines 66–15)

The invention provides a method and apparatus for graphical display and
management of hierarchical relationships between objects of drawing sheets created
by a computer aided design (CAD) application. Briefly, the present invention allows
a user of a computer-implemented application to define and modify one or more
hierarchical relationships between multiple objects of drawing sheets generated by
the CAD application. A user of the application to define or change relationships
between the drawing sheet objects can graphically manipulate icons corresponding to
drawing sheet objects. In one embodiment, the present invention also links
descriptive fields in one or more icons to corresponding descriptive fields in the
drawing sheet objects represented to update the icons automatically in response to
the drawing sheet objects being changed. In one embodiment, drawing sheet objects
can be moved between files by the user through manipulation of corresponding
icons.

Bonney: col. 3/4, lines 65-7

FIG. 2 is one embodiment of a computer system executing a CAD
application program that generates objects of the drawing sheets of a design with a
hierarchical relationship. While described in terms of computer-aided design (CAD)
software, the present invention is not limited to use with CAD applications and files.

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For example, the present invention can be used to manage and organize inventories. Additionally, while described in terms of "sheets," the present invention is not limited to use with CAD sheets, and can be used with other types of objects.
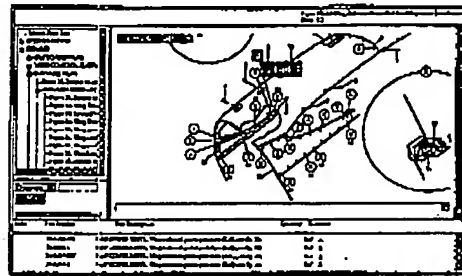
Shema: Fig. 7

Figure 7

Shema: paragraph [0054]

[0054] FIG. 7 depicts an embodiment of the present invention displaying a graphic representation of an article on one of a plurality of sheets within a drawing set. When the user selects the callout reference designation "H," the APS associated with callout reference designation "H" instructs the intelligent graphic viewer 36 to highlight the reference designation "H" and to display and magnify the reference designation label "Callout H." In addition, the APS instructs the intelligent graphic viewer 36 to display the sheet containing the target detail label reference designation "H," which is located on a different sheet. FIG. 8 is the display of the different sheet of the intelligent graphics file 32 where the detail label reference designation "H" is located. The APS also instructs the intelligent graphic viewer 36 to highlight the detail label reference designation "H" to direct the user's attention to the appropriate area of the display.

Applicants' attorney respectfully submits that the above portions of Bonney and Shema do not teach or suggest the combination of limitations found in Applicants' amended independent claims.

For example, the assertion by the Office Action that the limitations "the Sheet Set Manager allows users to place callouts on the Sheets directly from the window" (from independent claims 1, 7 and 13) is shown in Shema, at paragraph [0054] and Fig. 7, is erroneous. Instead, the cited portions of Shema merely describe the displaying of a sheet, and the selection of a callout from the displayed sheet, which results in the highlighting and magnifying of the callout, as well as the display of a different sheet containing the detail for the callout.

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However, nothing in the above portions of Shema or Bonney refer to users placing callouts on Sheets directly from a window of a Sheet Set Manager showing a logical structure for the Sheet Sets in visual form comprising a hierarchical representation of the Sheet Sets. Consequently, the combination of Bonney and Shema does not teach or suggest these limitations.

Thus, Applicants' attorney submits that independent claims 1, 7 and 13 are allowable over the combination of Bonney and Shema. Further, dependent claims 3-6, 9-12 and 15-18 are submitted to be allowable over the combination of Bonney and Shema the same manner, because they are dependent on independent claims 1, 7 and 13, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-6, 9-12 and 15-18 recite additional novel elements not shown by the combination of Bonney and Shema.

III.   CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.
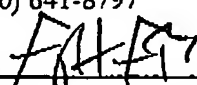
Respectfully submitted,

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